

March 1, 2024

VIA ECF

Hon. Pamela K. Chen
United States District Court Eastern District of New York
225 Cadman Plaza East, Room N631
Brooklyn, New York 11201

Re: *Michael Grecco Productions, Inc. v. Alamy Inc. and Alamy Ltd.*
Case No. 1:18-cv-3260-PKC-JAM

Dear Judge Chen:

The Alamy Defendants respectfully write in response to Your Honor's December 6, 2023 Order, which directed (1) the parties to advise the Court if discovery from the new case *Michael Grecco Productions, Inc. v. Alamy Inc. et al*, 23-CV-8321-PKC-JAM, impacts summary judgment in this case; and (2) the Alamy Defendants to advise if they intend to seek relief regarding whether the Complaint in the 2023 case violated the Protective Order in this case.

As to the first issue, there is no impact on summary judgment to report because discovery in the 2023 case has not begun. Several subsequent Orders in the 2023 case (dated February 16 and 19, 2024) required Plaintiff to file an amended complaint by March 1, 2024, and suspended the initial conference in that case, so there is currently no new information to report.

As to the second issue, upon further review, the Alamy Defendants will not seek relief as to potential violations of the Protective Order based on the Complaint in the 2023 case.

Respectfully submitted,

/s/ Nancy E. Wolff
Nancy E. Wolff

cc: All Counsel of Record (via ECF)